Montana Department of
ENVIRONMENTAL QUALITY
Judy Martz, Governor
P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.state.mt.us

July 1, 2004

Mr. James Harris
U.S. Environmental Protection Agency
Region 8, Montana Office
Federal Building, 10 West 15th Street, Suite 3200
Helena, MT 59626

RE: DRAFT *Request to Modify Groundwater Treatment System, Former Somers Tie Treating Plant*

Dear Mr. ~~Harris:~~ Jim

The Montana Department of Environmental Quality (DEQ) has received and reviewed the draft *Request to Modify Groundwater Treatment System* dated April 30, 2004. DEQ's comments on this document are provided below.

GENERAL COMMENTS

1. The Technical Impracticability (TI) evaluation demonstrated that it is impracticable for the groundwater treatment system at the BN Somers Site to meet ARARs. The ARARs are State and federal groundwater standards. The groundwater clean up levels listed in the Record of Decision (ROD) and Explanations of Significant Difference (ESDs) are not ARARs, but are risk-based numbers, and as such are not eligible for waiver through the TI process. Until such time that the contaminants of concern and corresponding risk-based standards are separately waived by EPA either through a ROD amendment or an Explanation of Significant Difference if appropriate, DEQ believes that it is premature to grant BN's request to shut down the existing groundwater remedy.

2. DEQ requests that the groundwater monitoring schedule be quarterly for the first two years, and then be modified to semiannually in years 4, 8, 16, and 30 if it is determined that the area of contamination has stabilized.

3. Will the Groundwater Treatment System (GWTS) remain in standby until it is determined that the contaminant plume is stable? Will other wells be abandoned or

remain as is until it has been determined whether migration of contaminants is occurring?

SPECIFIC COMMENTS

1. Page E-1. Executive Summary. Paragraph 2. Sentence 4. Modify sentence to read "Site geology, hydrogeology, and creosote characteristics are the primary impediments to movement..."

2. Page 1-1. Section 1. Paragraph 2. Sentence 3. Modify sentence to read "...based on the limited ability of the system ..."

3. Page 1-1. Section 1. Paragraph 2. While the paragraph describes how protectiveness of human health has been achieved, it does not address protectiveness of the environment. Please include this information in the paragraph.

4. Page 2-8. Section 2.8. Sentence 8. Change "... determined to as protective as the 1989..." to "determined to *be* as protective as the 1989..."

5. Page 2-10. Section 2.4.1. Is it necessary to describe the soil remedy when the purpose of the document is to discuss the groundwater remedy? Section 2.4.1 could be deleted, and Section 2.4 retitled "Groundwater Remedy Implementation."

6. Page 2-12. Bullet 3. "No discernable site-wide groundwater quality improvements have been achieved." This statement needs to be supported by data – and "before", "during", and "today" figures would help support the validity of this statement.

7. Page 2-13. Paragraph 1. In discussions of the TI Evaluation, it is necessary to explain that the TI only applies to the cleanup goals that were based on the ARARs. This discussion should also explicitly state that the remediation levels as adopted in Explanations of Significant Difference (ESDs) are risk-based levels, and as such are not eligible for waiver through the TI process. Another ESD will be required for the risk-based numbers to be modified.

8. Page 2-13. Paragraph 2. Change "insure" to "ensure".

9. Page 3-1. Section 3.1.1. Paragraph 2. Sentence 5. Change "deposed" to "deposited".

10. Page 4-2 - 4-3. Section 4. Table 4-1 and associated discussion, Table 4-2 and associated discussion, Table 4-3 and associated discussion. p. 4-2. Why is no extraction data provided for 2001-2003? The document needs to be consistent and thorough in the data presented throughout the document. p. 4-3. Again, who is no injection data after 2000 presented? The document must include all data. Include injection data for 2001-2003.

11. Page 4-6. Section 4.3. As reported in the *Phase I Groundwater Remedy Annual CERCLA* Report, Wells S-93-2D and S-93-2S show marked increases in contaminant concentrations in September and December of 2003. The *Groundwater Remedy Annual Report* stated that there is a statistically significant upward trend in well S-93-2D. This must be addressed and thoroughly described. How is this explained? Will shutting down the groundwater treatment system impact this upward trend? DEQ believes that wells S-93-2D and S-93-2S should be included in the monitoring network until such time that the trend in these wells can be completely evaluated.

12. Page 5-3. First complete paragraph. Sentence 3. It is stated that the hydraulic conductivity used in the modeling is 3.3×10^{-7} ft/sec (0.02851 ft/day) for low permeability clay. Section 3.2 states that site-specific estimates of hydraulic conductivity range from 0.0436 ft/day to 1.64 ft/day. The hydraulic conductivity used in the modeling does not fall within the stated range. Explain this discrepancy.

13. Pages 5-1 to 5-6. The discussion in the text of this section intermixes metric and English units. This is also the case in Section 3.3. Throughout the document, be consistent in the use of units – preferably English.

14. Page 6-1. Section 6.1. Paragraph 1. Last sentence. "Monitoring is proposed to demonstrate plume stability and compliance with remediation goals…" How will plume stability be determined? Include a specific description of the means by which plume stability will be assessed.

If you have any questions regarding these comments, please contact me at 406-841-5037 or via email at lidewitt@state.mt.us.

Sincerely,

Lisa M. DeWitt
Environmental Specialist